# STATIONARY SOURCE PERMIT TO OPERATE

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

The Lane Company 701 Fifth Street Altavista, VA 24517 Registration No.: 30248 County-Plant No.: 031-0005

is authorized to operate

a wood furniture manufacturing facility

located at

701 Fifth Street Altavista, Virginia

in accordance with the Conditions of this permit.

The expiration date for this permit is <u>March 4, 2007</u>.

Approved on March 4, 2002

Robert G. Burnley Director

Permit consists of 36 pages. Permit Conditions 1 to 83.

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<u>PERMIT CONDITIONS</u> - the regulatory reference and authority for each condition is listed in parentheses () after each condition.

# **Operate in Accordance with Permit**

1. The permitted facility is to be operated in accordance with the terms of this permit. You are also advised that the conditions of the Department's permits dated October 24, 1977; March 14, 1997; August 16, 2000; and May 31, 2001 are still valid. This permit is subject to revocation prior to its expiration date if the permittee fails to comply with the terms and conditions of the permit, any applicable federal or state requirements as defined in State Regulation 9 VAC 5 Chapter 80 Article 1 or any provisions of State Regulation 9 VAC 5 Chapter 80 Article 1. Any physical change in, or change in the method of operation of, the stationary source subject to this permit may be subject to State Regulations 9 VAC 5-80-10, 9 VAC 5-80-1790, 9 VAC 5-80-30, or 9 VAC 5-80-50 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios. (9 VAC 5-80-260, 9 VAC 5-80-190.)

Such changes that may require a permit modification and/or revisions include, but are not limited to, the following:

- a. Erection, fabrication, installation, addition, or modification of an emissions unit (which is the source, or part of it, which emits or has the potential to emit any regulated air pollutant), or of a source, where there is, or there is the potential of, a resulting emissions increase;
- b. Reconstruction or replacement of any emissions unit or components thereof such that its capital cost exceeds 50% of the cost of a whole new unit;
- c. Any change at a source which causes emission of a pollutant not previously emitted, an increase in emissions, production, throughput, hours of operation, or fuel use greater than those allowed by the permit, or by 9 VAC 5-80-11, unless such an increase is authorized by an emission cap; or any change at a source which causes an increase in emissions resulting from a reduction in control efficiency, unless such an increase is authorized by an emissions cap;
- d. Any reduction of the height of a stack or of a point of emissions, or the addition of any obstruction which hinders the vertical motion of exhaust;
- e. Any change at the source which affects its compliance with conditions in this permit, including conditions relating to monitoring, recordkeeping, and reporting;
- f. Addition of an emissions unit which qualifies as insignificant by emissions rate (9 VAC 5-80-720 B) or by size or production rate (9 VAC 5-80-720 C);
- g. Any change in insignificant activities, as defined by 9 VAC 5-80-90 D.1.a(1) and by 9 VAC 5-80-720 B. and C.

If there is any change made at the permitted facility which requires a new permit or a permit modification under 9 VAC 5-80-10, 9 VAC 5-80-1790, 9 VAC 5-80-30, it may be necessary to reopen this permit under 9 VAC 5-80-110 to ensure that applicable requirements continue to be met. (9 VAC 5-80-110 M, 9 VAC 5-80-110 G, 9 VAC 5-80-110 J, 9 VAC 5-80-190, 9 VAC 5-80-240, 9 VAC 5-80-260.)

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# **Equipment to be operated**

2. Equipment to be operated consists of:

| Signi                  | ficant Emissions Units   |                       |   |  |                             |
|------------------------|--|-----------------------|---|--|-----------------------------|
| Emission<br>Unit<br>ID | Emission Unit Description  | Capacity/<br>Size     | Pollution<br>Control<br>Device<br>(PCD) | PCD<br>ID  | Applicable Permit Date      |
| Fuel Burn              | <b>ning Equipment</b> Sul  | bject to 9 VAC        | 5 Chapter 50                            | (New or Modified)  |                             |
| B#5                    | Erie City Model VC   | 140 MMBtu<br>per hour | Multi-<br>cyclone                       | MCB5   | 10/24/77 &<br>8/16/00       |
| Woodwor                | rking Equipment Sul  | oject to 9 VAC        | 5 Chapter 40                            | (Existing)   |                             |
| W1                     | Woodworking dust collection<br>systems for saws, planers,<br>moulders, lathes, routers,<br>trimmers, banders, miters, borers,<br>tenoners, slotters, shapers, hogs,<br>and sanders | Various               | 24<br>Cyclones                          | 0121, 0137, 1043,<br>1099, 2001, 2002,<br>2006, 2007, 2009,<br>2010, 2011, 2012,<br>2013, 2015, 2016,<br>2017, 2018, 2073,<br>2082, 2083, 2135,<br>2480, 3276, 4239                        | N/A                         |
| W1                     | Woodworking dust collection systems  | Various               | 4 Fabric filters                        | BH1, BH3, BH7, BH8   | N/A                         |
| Woodwor                | rking Equipment Sul  | pject to 9 VAC        | 5 Chapter 50                            | (New or Modified)  |                             |
| W1                     | Woodworking dust collection systems  | Various               | 5 Fabric filters                        | BH2, BH4, BH5, BH6,<br>BH9   | Consent<br>Order<br>6/10/77 |
|                        |  |                       | filter 4 Fabric filters                 | BHS(A), BHS(B),<br>BHS(C), BHS(E),   | N/A 5/31/01                 |
|                        |  |                       | Inters                                  |  |                             |
| W1                     | Woodworking dust collection system for sawing wet wood   | Various               | 1 Cyclone                               | 0007   | 3/14/97                     |
| Furniture              | Finishing Equipment Subject to   | o 9 VAC 5 Cha         | pter 40 (Exis                           | ting)  | 1                           |
| F1                     | 59 spray booths in Plant 2 with various ovens and cleaning tanks   | Various               | None " " " " " " " "                    | 0217, 0403, 0415,<br>0550, 0634, 0645,<br>0730, 0731, 0735,<br>0751, 0752, 0753,<br>0754, 0755, 0756,<br>0761, 0762, 0774,<br>0775, 0776, 0777,<br>0778, 0779, 0780,<br>0782, 0785A, 0786, | N/A                         |

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| T         | 1                                | 1              | T            | T                                     | <u> </u>   |
|-----------|----------------------------------|----------------|--------------|---------------------------------------|------------|
| Emission  |                                  |                | Pollution    |                                       | Applicable |
| Unit      | Emission Unit                    | Capacity/      | Control      | PCD                                   | Permit     |
|           | Description                      | Size           | Device       | ID                                    |            |
| ID        |                                  |                | (PCD)        |                                       | Date       |
|           |                                  |                | "            | 0787, 0794, 0795A,                    |            |
|           |                                  |                | "            | 0798A, 0799, 0800,                    |            |
|           |                                  |                | "            | 0882, 0885A,                          |            |
|           |                                  |                | "            | 0888, 0895,                           |            |
|           |                                  |                | Dry filters  | 0972, 0973,                           |            |
|           |                                  |                | None         | 0982, 0983, 0984,                     |            |
|           |                                  |                | "            | 0985, 0986, 0987,                     |            |
|           |                                  |                | "            | 0988, 0989, 0990,                     |            |
|           |                                  |                | "            | 0991, 0992, 0993,                     |            |
|           |                                  |                | "            | 1013, 1391, 1392,                     |            |
|           |                                  |                | "            | 1393, 1395, 1397,                     |            |
|           |                                  |                | "            | 2603, 2808                            |            |
|           |                                  |                |              |                                       |            |
| Furniture | Finishing Equipment Subject t    | o 9 VAC 5 Cha  | pter 50 (Nev | 1                                     | 1          |
| F1        | 4 spray booths for R&D in Plant  | Various        | Dry filters  | WC1, WC2, WC3,                        | 5/31/01    |
|           | 4 with ovens and cleaning tank   |                | or water     | WC4                                   |            |
|           |                                  |                | wash         |                                       |            |
| F1        | 2 spray booths offline with      | Various        | Dry filters  | WC5, WC6                              | 5/31/01    |
|           | various ovens and cleaning tanks |                | or water     |                                       |            |
|           | in Plant 4                       |                | wash         |                                       |            |
|           |                                  |                |              |                                       |            |
| F1        | 1 robotic spray booth with oven  | 10.68 gallons  | Dry filters  | WC7                                   | 5/31/01    |
|           | in Plant 4                       | per hour       | or water     |                                       |            |
|           | III I leuit 4                    | per nour       | wash         |                                       |            |
| F1        | 1 11 (7)(0100) 14                | 1604 11        |              | NT.                                   | 5/21/01    |
| F1        | 1 rollcoater (WC12S) with oven   | 16.04 gallons  | None         | None                                  | 5/31/01    |
|           | in Plant 4                       | per hour       |              |                                       |            |
| F1        | 1 repair spray booth in Plant 2  | 1.75 gallons   | Dry filters  | 4623                                  | 5/31/01    |
|           |                                  | per hour       | or water     |                                       |            |
|           |                                  |                | wash         |                                       |            |
|           |                                  |                |              |                                       |            |
| Furniture | e <b>Gluing Equipment</b> Sul    | bject to 9 VAC | 5 Chapter 40 | (Existing)                            |            |
|           |                                  |                | - T          | , , , , , , , , , , , , , , , , , , , |            |
| Wood Dr   | r <b>ying</b> Sul                | bject to 9 VAC | 5 Chapter 40 | (Existing)                            | 1          |
| DK        | 21 dry kilns                     | 30,000 board   | _            | None                                  | N/A        |
|           |                                  | feet each      |              |                                       |            |
| i .       |                                  | 1001 00011     |              |                                       |            |

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# **Insignificant Activities and Emissions Units**

The following emission units at the facility are identified in the application as being subject to 9 VAC 5 Chapter 40 or Chapter 50 and are listed as insignificant emission units in 9 VAC 5-80-720 B and/or C:

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| Emission<br>Unit<br>ID | Emission Unit Description   | Capacity/<br>Size       | Applicable<br>Requirement     |
|------------------------|---|-------------------------|-------------------------------|
| Insignifica            | nt Emissions Units  |                         | 9 VAC 5-80-720 A              |
| DFP                    | 2 diesel fueled emergency fire pumps                                    | Various                 | 9 VAC 5-40-80, 9 VAC 5-40-280 |
| Emissions              | <b>Units with Insignificant Emis</b>                                    | ssions Levels           | 9 VAC 5-80-720 B              |
| PW                     | 7 parts washers   | Various                 | 9 VAC 5-40-20                 |
| G1                     | Various gluing processes including spreaders, spray booth, and assembly | Various                 | 9 VAC 5-40-20                 |
| CDT                    | Cleaning and dip tanks  | Various                 | 9 VAC 5-40-20                 |
| Emissions              | Units of Insignificant Size or  | <b>Production Rate</b>  | 9 VAC 5-80-720 C              |
| WOB                    | 1 waste oil boiler, Model #<br>CB90-BH                                  | 280,000 Btu per<br>hour | 9 VAC 5-40-80, 9 VAC 5-40-280 |

These emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110. Provided, however, that one or more of the emission units identified above shall be subject to monitoring, recordkeeping, and reporting requirements pursuant to 9 VAC 5-80-110 if, in the Director's determination, operation of the emission unit(s) indicates a failure to comply with applicable regulations. The Director shall permit revision proceedings in accordance with 9 VAC 5-80-190 through 9 VAC 5-80-240, as appropriate, to impose specific permit conditions upon such noncomplying emission unit(s).

# Fuel Burning Conditions - Erie City 140 MMBtu/hr wood/coal-fired boiler (B#5)

#### **Emission Control**

3. Particulate emissions from the Erie City (B#5) wood/coal-fired boiler shall be controlled by a multicyclone. The multicyclone shall be provided with adequate access for inspection. (9 VAC-5-50-260, 9 VAC 5-80-110 C, Condition 3 NSR permit dated 8/16/00)

#### Limitations

- 4. The approved fuels for the Erie City boiler are wood and coal, including wood fuel generated from the manufacturing processes of sources with SIC 2511. The permitted facility may switch from one of these approved fuels to another approved fuel without notification. A change to a fuel not listed above may require a permit modification.
  - (9 VAC-80-10, 9 VAC 5-80-110 B, Condition 5 NSR permit dated 8/16/00)

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5. Emissions from the operation of the Erie City boiler shall not exceed the limits specified below:

Particulate Matter 0.27 lbs/10<sup>6</sup> Btu PM-10 0.27 lbs/10<sup>6</sup> Btu

(9 VAC 5-50-260, 9 VAC 5-80-110 B, Condition 4 NSR permit dated 10/24/77)

- 6. Visible emissions from the Erie City boiler exhaust shall not exceed 20 percent opacity, except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
  - (9 VAC 5-50-80, 9 VAC 5-80-110 K, Condition 8 NSR permit dated 8/16/00)
- 7. The sulfur and ash content of the coal to be burned in the Erie City boiler shall not exceed 1 percent and 10 percent by weight, respectively, per shipment. The permittee shall maintain records (supplier fuel analysis) of all coal shipments purchased. These records shall be available on site for inspection by the DEQ. Such records shall be current for the most recent five years.

(9 VAC 5-80-10, 9 VAC 5-80-110, Condition 6 NSR permit dated 8/16/00)

- 8. The permittee shall obtain a certification from the fuel supplier with each shipment of coal. Each fuel supplier certification shall include the following:
  - a. the date on which the coal was received;
  - b. the sulfur content of the coal;
  - c. the ash content of the coal

(9 VAC 5-80-110, Condition 7 NSR permit dated 8/16/00)

# **Monitoring**

- 9. The multicyclone shall be equipped with a monitoring device to continuously measure pressure drop. Each monitoring device shall be installed, maintained, calibrated, and operated in accordance with approved procedures which shall include, at a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the multicyclone is operating.
  - (9 VAC 5-80-10 H, 9 VAC 5-50-20 C, 9 VAC 5-50-260, 9 VAC 5-80-110, Condition 4 NSR permit dated 8/16/00)
- 10. At least one time per calendar week an observation of the presence of visible emissions from the Erie City boiler stack shall be made. The presence of visible emissions shall require the permittee to:

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- a. take timely corrective action such that the boiler, with visible emissions, resumes operation with no visible emissions, or,
- b. conduct a visible emission evaluation (VEE) on the boiler, with visible emissions, in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the boiler are 20 percent opacity or less. If any of the observations exceed the opacity limitation of 20%, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the boiler resumes operation within the 20% opacity limit.

The permittee shall maintain a boiler stack observation log to demonstrate compliance. The log shall identify the emissions point, include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the observers name. If the boiler has not been operated for any period during the week, it shall be noted in the boiler log book. (9 VAC 5-80-110 E, 9 VAC 5-80-110 K)

11. Once each permit term, at a frequency not to exceed five years, the permittee shall conduct a stack test for Particulate Matter from the Erie City boiler to demonstrate compliance with the emission limit contained in Limitations Condition 5 of this permit. The test shall be performed within 180 days after the effective date of this permit or after the boiler has been restarted for regular use, which ever occurs later. The test shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30. The details of the tests shall be arranged with the South Central Regional Office. The permittee shall submit a test protocol at least 30 days prior to testing. Two copies of the test results shall be submitted to the South Central Regional Office within 60 days after test completion and shall conform to the test report format enclosed with this permit.

(9 VAC 5-50-30, 9 VAC 5-80-10 J)

#### **Maintenance/Operating Procedures**

- 12. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the Erie City boiler, with respect to air pollution control equipment and process equipment which affect such emissions:
  - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
  - b. Develop an inspection schedule for the Erie City boiler, annual at a minimum, to insure operational and structural integrity of the boiler and maintain records of inspection results.
  - c. Develop an inspection schedule for the Erie City multicyclone, annual at a minimum, to insure operational and structural integrity of the multicyclone and maintain records of inspection results.
  - d. Maintain an inventory of spare parts.

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- e. Have available written operating procedures for the Erie City boiler and multicyclone. These procedures shall be based on the manufacturer's recommendations, at minimum.
- f. Train operators in the proper operation of the Erie City boiler and multicyclone, and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

(9 VAC 5-50-20, 9 VAC 5-80-110 K, 9 VAC 5-80-110 F, Condition 14 NSR permit dated 8/16/00)

#### Recordkeeping

- 13. Emission monitoring for the Erie City boiler, not otherwise required by this permit, shall consist of the following fuel consumption and operating data:
  - a. Coal shipments purchased, indicating the sulfur and ash content per shipment.
  - b. Records of the visible emission and opacity observations from the Erie City boiler as required by Monitoring Condition 10.
  - c. Records of maintenance, inspections, and training for the Erie City boiler and multicyclone as required by Maintenance Condition 12.

The content of and format of such records shall be arranged with the South Central Regional Office. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.)
(9 VAC 5-50-50, 9 VAC 5-80-110 F, Condition 9 NSR permit dated 8/16/00)

#### **Woodworking Conditions (W1)**

dated 5/31/01)

## **Emission Control - Plant 2 and 4**

- 14. Particulate emissions from each of the woodworking dust collection systems Ref. Nos. BH1 through BH10, BHS(A), BHS(B), BHS(D), and BHS(E) shall be controlled by a fabric filter. The fabric filters shall be provided with adequate access for inspection. The fabric filters shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order. (9 VAC 5-40-20, 9 VAC 5-50-20, 9 VAC 5-50-260, 9 VAC 5-80-110 C, Consent Order dated 6/10/77, Condition 3 NSR permit dated 5/31/01)
- 15. Fugitive particulate emissions from the collection, transfer and handling of the collected material from the woodworking dust collection systems listed in Condition 14 shall be controlled by a fabric filter, or rotary air lock from the collector to an enclosed bin or complete enclosure.

  (9 VAC 5-40-20, 9 VAC 5-50-20, 9 VAC 5-50-260, 9 VAC 5-80-110 C, Condition 4 NSR permit

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- 16. Particulate emissions from each of the woodworking dust collection systems Ref. No. 0121 thru 4239 shall be controlled by a cyclone. The cyclones shall be provided with adequate access for inspection. (9 VAC 5-40-2270, 9 VAC 5-80-110 C)
- 17. Fugitive particulate emissions from the collection, transfer and handling of the collected material from the woodworking dust collection systems listed in Condition 16 shall be controlled by a fabric filter or cyclone or rotary air lock from the collector to an enclosed bin or complete enclosure.
  (9 VAC 5-40-20, 9 VAC 5-80-110 C)

# **Emission Control - Cedar Log Sawing**

- 18. Particulate emissions from the log sawing operation shall be controlled by high efficiency cyclone Ref No. 0007. The cyclone shall be provided with adequate access for inspection. An annual internal inspection shall be conducted on the cyclone by the permittee to insure structural integrity.

  (9 VAC 5-50-260, 9 VAC 5-80-10 H, 9 VAC 5-80-110 C, Condition 3 NSR permit dated 3/14/97)
- 19. All subsequent transfer of the collected material from the cyclone Ref No. 0007 shall be controlled a completely enclosed transfer system.

(9 VAC 5-50-260, 9 VAC 5-80-110 C, Condition 4 NSR permit dated 3/14/97)

- 20. Fugitive particulate emissions from the collection and transferring of collected wood dust shall be controlled by
  - a. A rotary air lock from the collector to the auger, and
  - b. Reasonable precautions shall be taken to prevent wind erosion of the wood dust from the trailer loadout

(9 VAC 5-50-260, 9 VAC 5-80-110 C, Condition 5 NSR permit dated 3/14/97)

# Limitations - Plant 2 and 4

21. Emissions from the operation of the woodworking dust collection systems Ref. Nos. BHS(A), BHS(B), BHS(C), and BHS(E) shall not exceed the limits specified below:

Particulate Matter 0.01 gr/dscf PM-10 0.01 gr/dscf

(9 VAC 5-50-260, 9 VAC 5-80-110 B, Condition 7 NSR permit dated 5/31/01)

22. Visible emissions from the woodworking dust collection systems Ref. Nos. BHS(A), BHS(B), BHS(C), and BHS(E) shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.

(9 VAC 5-50-260, 9 VAC 5-80-110 K, Condition 9 NSR permit dated 5/31/01)

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23. Visible emissions from any fugitive emission points associated with the woodworking dust collection systems Ref. Nos. BHS(A), BHS(B), BHS(C), and BHS(E) shall not exceed ten (10) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

(9 VAC 5-50-260, 9 VAC 5-80-110 K, Condition 10 NSR permit dated 5/31/01)

24. Emissions from the operation of the woodworking dust collection systems Ref. Nos. 0121 through 4239 and BH1 through BH10 shall not exceed the limits specified below:

Particulate Matter 0.05 gr/dscf PM-10 0.05 gr/dscf

(9 VAC 5-40-2270, 9 VAC 5-80-110 B)

25. Visible emissions from the woodworking dust collection systems Ref. Nos. 0121 through 4239 and BH1, BH3, BH7, and BH8 shall not exceed 20 percent opacity, except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

(9 VAC 5-40-80, 9 VAC 5-80-110 K)

26. Visible emissions from the woodworking dust collection systems Ref Nos. BH2, BH4, BH5, BH6, BH9 and BH10 shall not exceed 20 percent opacity, except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

(9 VAC 5-50-80, 9 VAC 5-80-110 K)

#### **Limitations - Cedar Log Sawing**

27. The annual throughput of wood for the log sawing operation shall not exceed 25,275 tons of wood, calculated monthly as the sum of each consecutive 12 month period.(9 VAC 5-80-110, Condition 7 NSR permit dated 3/14/97)

28. Emissions from the operation of the log sawing operation shall not exceed the limits specified below:

Particulate Matter 0.01 gr/dscf 4.3 tons/yr PM-10 0.01 gr/dscf 4.3 tons/yr

The tons/yr emissions are derived from the estimated overall emission contribution. Compliance with the annual limits may be determined as stated in Condition 27.

(9 VAC 5-50-260, 9 VAC 5-80-110 B, Condition 8 NSR permit dated 3/14/97)

29. Visible emissions from the high efficiency cyclone Ref No. 0007 shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

(9 VAC 5-50-20, 9 VAC 5-50-260, 9 VAC 5-80-110 K, Condition 9 NSR permit dated 3/14/97)

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30. Visible emissions from any fugitive emission points associate with woodworking dust control system Ref. No. 0007 shall not exceed ten (10) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

(9 VAC 5-50-20, 9 VAC 5-50-260, 9 VAC 5-80-110 K, Condition 10 NSR permit dated 3/14/97)

# **Monitoring**

- 31. The fabric filters Ref. Nos. BHA, BHB, BHD, BHE shall be equipped with devices to continuously measure the differential pressure drop across the fabric filter. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the fabric filter is operating. (9 VAC 5-80-110, 9 VAC 5-50-20 C, 9 VAC 5-50-260, Condition 5 NSR permit dated 5/31/01)
- 32. For woodworking dust control systems Ref. Nos. BHS(A), BHS(B), BHS(D), BHS(E) and 0007 at least one time per calendar week an observation of the presence of visible emissions from the dust control system exhaust stacks shall be made. If visible emissions are observed, timely corrective action shall be taken such that the dust control system resumes operation with no visible emissions. The permittee shall maintain a dust control system exhaust stack observation log to demonstrate compliance. The log shall identify the emissions point, include the date and time of the observations, whether or not there were visible emissions, any necessary corrective action, and the observers name. If a dust control system has not been operated for any period during the week, it shall be noted in the dust control system log book. (9 VAC 5-80-110 E, 9 VAC 5-80-110 K)
- 33. For all woodworking dust control systems, except those listed in Condition 32, at least one time per calendar week an observation of the presence of visible emissions from the dust control system exhaust stacks shall be made. If visible emissions are observed:
  - a. Timely corrective action shall be taken such that the dust control system resumes operation with no visible emissions, or
  - b. Conduct a visible emission evaluation (VEE) in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the cyclone exhaust are 20 percent opacity or less. If any of the observations exceed the opacity limitation of 20 percent, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the dust control system resumes operation within the 20 percent opacity limit.

The permittee shall maintain a dust control system exhaust stack observation log to demonstrate compliance. The log shall identify the emissions point, include the date and time of the observations, whether or not there were visible emissions, any necessary corrective action, and the observers name. If a dust control system has not been operated for any period during the week, it shall be noted in the log book.

(9 VAC 5-80-110 E, 9 VAC 5-80-110 K)

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# **Maintenance/Operating Procedures**

- 34. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the fabric filters and cyclones, with respect to air pollution control equipment and process equipment which affect such emissions:
  - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
  - b. Develop an inspection schedule for the fabric filters, monthly at a minimum, to insure operational integrity of the fabric filters and maintain records of inspection results.
  - c. Develop an inspection schedule for the cyclones, annual at a minimum, to insure operational and structural integrity of the cyclones and maintain records of inspection results.
  - d. Have available written operating procedures for the fabric filters and cyclones. These procedures shall be based on the manufacturer's recommendations, at minimum.
  - e. Train operators in the proper operation of the fabric filters and cyclones, and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.
  - f. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

(9 VAC 5-40-20, 9 VAC 5-50-20, 9 VAC 5-80-110 K, 9 VAC 5-80-110 F, Conditions 16 & 17 NSR permit dated 3/14/97)

#### Recordkeeping

- 35. Emission monitoring for the woodworking operations, not otherwise required by this permit, shall consist of the following operating data:
  - a. The monthly and yearly throughput of number of tons of wood for the cedar log sawing operation. Annual throughput shall be calculated as the sum of each consecutive 12-month period.
  - b. Records of the visible emission and opacity observations from the fabric filters and cyclones as required by Monitoring Conditions 32 and 33.
  - c. Records of maintenance, inspections, and training for the fabric filters and cyclones as required by Maintenance Condition 34.

The content of and format of such records shall be arranged with the South Central Regional Office. These records shall be available on site for inspection by the DEQ and shall be current for the most recent

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five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.)
(9 VAC 5-40-50, 9 VAC 5-50-50, 9 VAC 5-80-110 F, Conditions 12 NSR permit dated 3/14/97)

#### **Furniture Finishing Conditions (F1)**

#### **Emission Control**

36. Particulate emissions in Plant 4 from repair/R&D spray booths Ref. Nos. WC1, WC2, WC3, & WC4; offline spray booths Ref. Nos. WC5 & WC6; and robotic spray booth Ref. No. WC7 and in Plant 2 spray booths Ref. Nos. 0972 & 0973 and repair spray booth Ref. No. 4623 shall be controlled by filters or water wash. The spray booths shall be provided with adequate access for inspection. (9 VAC 5-40-20, 9 VAC 5-50-260, 9 VAC 5-80-110 C, Condition 6 NSR permit dated 5/31/01)

#### Limitations

37. Emissions from the operation in Plant 4 of the spray booths Ref. Nos. WC1 through WC7 and rollcoater Ref. No. WC12 and from the operation of Plant 2 repair spray booth Ref. No. 4623 shall not exceed the limits specified below:

Volatile Organic Compounds

77.0 tons/yr

(9 VAC 5-50-260, 9 VAC 5-80-110 B, Condition 8 NSR permit dated 5/31/01)

- 38. Visible emissions from the Plant 4 spray booths Ref. Nos. WC1 through WC7 and from the Plant 2 repair spray booth Ref. No. 4623 exhaust shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

  (9 VAC 5-50-260, 9 VAC 5-80-110 K, Condition 9 NSR permit dated 5/31/01)
- 39. Visible emissions from all the spray booth exhausts, except those listed in Condition 38, shall not exceed 20 percent opacity, except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). (9 VAC 5-40-80, 9 VAC 5-80-110 K)

#### **Monitoring**

40. For the Plant 4 spray booths Ref. Nos. WC1 through WC7 and the Plant 2 repair spray booth Ref. No. 4623 at least one time per calendar week an observation of the presence of visible emissions from the spray booth exhaust stacks shall be made. If visible emissions are observed, timely corrective action shall be taken such that the spray booth resumes operation with no visible emissions. The permittee shall maintain a spray booth exhaust stack observation log to demonstrate compliance. The log shall identify the emissions point, include the date and time of the observations, whether or not there were visible emissions, any necessary corrective action, and the observers name. If a dust control system has not been operated for any period during the week, it shall be noted in the spray booth log book. (9 VAC 5-80-110 E, 9 VAC 5-80-110 K)

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- 41. At least one time per calendar week an observation of the presence of visible emissions from all the spray booth exhaust stacks, except those listed in Condition 40 shall be made. The presence of visible emissions shall require the permittee to:
  - a. take timely corrective action such that the spray booth, with visible emissions, resumes operation with no visible emissions, or,
  - b. conduct a visible emission evaluation (VEE) on the spray booth, with visible emissions, in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the spray booths are 20 percent opacity or less. If any of the observations exceed the opacity limitation of 20%,, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the spray booth resumes operation within the opacity limitation.

The permittee shall maintain a spray booth stack observation log to demonstrate compliance. The logs shall identify the emissions point, include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the observers name. If a spray booth has not been operated for any period during the week, it shall be noted in the spray booth log book.

(9 VAC 5-80-110 E, 9 VAC 5-80-110 K)

# **Maintenance/Operating Procedures**

- 42. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the spray booths, with respect to air pollution control equipment and process equipment which affect such emissions:
  - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
  - b. Have available written operating procedures for the spray booths. These procedures shall be based on the manufacturer's recommendations, at minimum.
  - c. Train operators in the proper operation of the spray booths, and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.
  - d. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

(9 VAC 5-40-20, 9 VAC 5-80-110 K, 9 VAC 5-80-110 F, Condition 17 NSR permit dated 5/31/01)

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#### Recordkeeping

- 43. Emission monitoring for finishing operations, not otherwise required by this permit, shall consist of the following operating data:
  - a. For the Plant 4 of the spray booths Ref. Nos. WC1 through WC7 and rollcoater Ref. No. WC12 and the Plant 2 repair spray booth Ref. No. 4623 the annual emissions VOCs in tons, calculated monthly as the sum of each consecutive 12-month period, as provided by Regmet computer program or similar approved software.
  - b. Records of the visible emission and opacity observations from the spray booths as required by Conditions 40 and 41.
  - c. Records of maintenance, inspections, and training for the spray booths as required by Condition 42.

The content of and format of such records shall be arranged with the South Central Regional Office. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.)

(9 VAC 5-40-50, 9 VAC 5-50-50, 9 VAC 5-80-110 F, Condition 12 NSR permit dated 5/31/01)

# **MACT Conditions**

44. The facility is to be operated in compliance with Federal requirements under 40 CFR 63, Subpart JJ, including future revisions (current copy attached) and with the requirements of 40 CFR Part 63, Subpart A as identified in Table 1 for Subpart JJ. All terms used regarding 40 CFR 63, Subpart JJ shall have the meanings as defined in 40 CFR 63.801 and 40 CFR 63.2.

(9 VAC 5-60-100; 40 CFR 63.800; 40 CFR 63, Subpart A; Condition 11 NSR Permit dated 5/31/01)

#### **Emission Standard**

- 45. Volatile Hazardous Air Pollutant (VHAP) emissions from the facility shall not exceed the following limits;
  - a. For finishing operations use any of the following methods;
    - i. Achieve a weighted average VHAP content across all coatings of 1.0 lb VHAP/lb solids, as applied;
    - ii. Use compliant finishing materials that meet the following specifications:
      - (1) Each sealer and topcoat has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;
      - (2) Each stain has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;

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- (3) Each thinner contains no more than 10.0 percent VHAP by weight except where excluded by Condition **45.a.ii**(**5**);
- (4) Each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;
- (5) Each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 1.0 lb VHAP/lb solids and a thinner containing no more than 3.0 percent VHAP by weight;
- iii. Use any combination of averaging, compliant coatings, and control device such that no greater than 1.0 lb of VHAP being emitted per lb of solids used;
- b. For cleaning operations strippable spray booth coatings shall be used that contain no more than 0.8 lb VOC/lb solids, as applied;
- c. For contact adhesive operations the use of compliant contact adhesives shall be based on the following criteria;
  - (1) For aerosol adhesives, as well as hot melt, PVA, and urea-formaldehyde adhesives, and for contact adhesives applied to nonporous substrates there is no limit on the VHAP content of these adhesives;
  - (2) For foam adhesives used in products that meet flammability requirements the VHAP content can be no more than 1.8 lb VHAP/lb solids, as applied;
  - (3) For all other contact adhesives the VHAP content can be no more than 1.0 lb VHAP/lb solids, as applied;

(9 VAC 5-60-100, 40 CFR 63.802)

# **Continuous Compliance**

- 46. Continuous compliance with the VHAP emissions limits shall be determined as follows: (See Notification of Compliance Condition 52 and Reporting Condition 53 for content and timing of report submissions and signature requirements)
  - a. For finishing operations when averaging is being used to show continuous compliance, the permittee shall submit the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report. The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0. The facility is in violation of the standard if E is greater than 1.0 for any month. A violation of the monthly average is a separate violation of the standard for each day of operation

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during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.

$$E = (M_{c1}C_{c1} + M_{c2}C_{c2} + ... + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + ... + S_nW_n)/(M_{c1} + M_{c2} + ... + M_{cn})$$
 Equation 1

E = the emission limit achieved by an emission point or a set of emission points, in lb VHAP/lb solids.  $M_c$  = the mass of solids in a finishing material or coating (c) used monthly, including exempt finishing materials and coatings, lb solids/month.

 $C_c$  = the VHAP content of a finishing material or coating (c), in pounds of VHAP per pound of coating solids.

S = the VHAP content of a solvent, expressed as a weight fraction, added to finishing materials or coatings.

W = the amount of solvent, in pounds, added to finishing materials and coatings during the monthly averaging period.

The Emission Limit (E in lb VHAP / lb solids) equals the sum, for all finishing materials and coatings, of the mass of solids in each material used within that month ( $M_c$  in lb solids / month) multiplied by the VHAP content in each material ( $C_c$  in lb VHAP / lb solids) plus the sum, for all solvents, of the mass of solvent used monthly (W in lb solvent / month) multiplied by the weight fraction of VHAP in the solvent (S in lb VHAP / lb solvent), with this total being divided by the sum, for all finishing materials and coatings, of the mass of solids in each finishing material and coating used within that month ( $M_c$  in lb solids / month).

- b. For finishing operations when compliant coatings are being used to show continuous compliance, the permittee shall use compliant coatings and thinners, maintain records that demonstrate the finishing materials and thinners are compliant, and submit a compliance certification with the semiannual report which states that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as stated in the Emission Standard Condition 45, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The facility is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.
- c. For finishing operations when compliant coatings are being used to show continuous compliance and the coatings are being applied using continuous coaters the permittee shall demonstrate continuous compliance by either of the following:
  - i. Use compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, use compliant thinners, and submit a compliance certification with the semiannual report which states that compliant coatings have been used each day in the semiannual reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. The facility is in violation of the standard whenever a noncompliant coating, as determined by records or by a sample of the coating, is used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.

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- ii. Use compliant coatings, as determined by the VHAP content of the coating in the reservoir, use compliant thinners, maintain a viscosity of the coating in the reservoir that is no less than the viscosity of the initial coating by monitoring the viscosity with a viscosity meter or by testing the viscosity of the initial coating and retesting the coating in the reservoir each time solvent is added, maintain records of solvent additions, and submit a compliance certification with the semiannual report which states that compliant coatings, as determined by the VHAP content of the coating in the reservoir, have been used each day in the semiannual reporting period. Additionally, the certification shall state that the viscosity of the coating in the reservoir has not been less than the viscosity of the initial coating, that is, the coating that is initially mixed and placed in the reservoir, for any day in the semiannual reporting period. The facility is in violation of the standard when a sample of the as-applied coating exceeds the applicable limit, as determined using EPA Method 311, or the viscosity of the coating in the reservoir is less than the viscosity of the initial coating.
- d. For contact adhesive operations when compliant adhesives are being used to show initial compliance the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.
- e. For strippable spray booth coatings the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.
- f. For work practice standards the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that the permittee is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation and the DEQ may require the permittee to modify the plan (see the Work Practices Standards Condition 50.a, below).

(9 VAC 5-60-100, 40 CFR 63.804.(g) & 40 CFR 63.8)

# **Testing**

If compliance testing is conducted the tests shall be conducted using the test methods and procedures as specified in 40 CFR 63.805 of Subpart JJ.
 (9 VAC 5-60-100, 40 CFR 63.805)

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#### **Submittals**

48. All submittals regarding 40 CFR 63, Subpart JJ to the Administrator shall be sent to the South Central Regional Office and to EPA Region III at the following address:

U.S. EPA Region III Air Protection Division (3AP00) ATTN: Wood Furniture NESHAP Coordinator 1650 Arch Street Philadelphia, PA 19103-2029

(9 VAC 5-60-100, 40 CFR 63.13)

# **Operation and Maintenance**

- 49. The permittee shall meet the following operation and maintenance requirements:
  - a. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.
  - b. Malfunctions shall be corrected as soon as practicable after their occurrence.
  - c. Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.
  - d. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the DEQ which may include, but is not limited to review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

#### **Work Practice Standards**

- 50. The permittee shall develop and implement the following work practice standards:
  - a. Work practice implementation plan The permittee shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for the finishing and gluing operations and addresses each of the work practice standards presented in Work Practice Standards Conditions 50.b. through 50.l. that follow. The plan shall be developed no more than 60 days after the compliance date. The written work practice implementation plan shall be available for inspection by the DEQ upon request. If the DEQ determines that the work practice implementation plan does not adequately address each of the topics specified in '63.803 of Subpart JJ or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the DEQ may require the permittee to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

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- b. Operator training course The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment in these operations, or implementation of the requirements of Subpart JJ. All new personnel shall be trained upon hiring. All existing personnel shall be trained within six months of the compliance date. All personnel shall be given refresher training annually. The permittee shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:
  - i. A list of all current personnel by name and job description that are required to be trained;
  - ii. An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
  - iii. Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
  - iv. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
- c. <u>Inspection and maintenance plan</u> The permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:
  - i. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;
  - ii. An inspection schedule;
  - iii. Methods for documenting the date and results of each inspection and any repairs that were made;
  - iv. The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
    - (1) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
    - (2) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

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- d. <u>Cleaning and washoff solvent accounting system</u> The permittee shall develop an organic HAP solvent accounting form to record:
  - i. The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in '63.801 of Subpart JJ;
  - ii. The number of pieces washed off, and the reason for the washoff; and
  - iii. The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.
- e. <u>Chemical composition of cleaning and washoff solvents</u> The permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of Subpart JJ (see attached), in concentrations subject to MSDS reporting as required by OSHA.
- f. Spray booth cleaning The permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the permittee shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.
- g. <u>Storage requirements</u> The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
- h. <u>Application equipment requirements</u> The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
  - i. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
  - ii. For touchup and repair under the following conditions:
    - (1) The touchup and repair occurs after completion of the finishing operation; or
    - (2) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
  - iii. When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
  - iv. When emissions from the finishing application station are directed to a control device;

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- v. The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
- vi. The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The permittee shall demonstrate technical or economic infeasibility by submitting to the DEQ a videotape, a technical report, or other documentation that supports the permittee's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the permittee's claim of technical or economic infeasibility:
  - (1) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
  - (2) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
- i. <u>Line cleaning</u> The permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.
- j. <u>Gun cleaning</u> The permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container.
- k. Washoff operations The permittee shall control emissions from washoff operations by:
  - i. Using normally closed tanks for washoff; and
  - ii. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.
- l. <u>Formulation assessment plan for finishing operations</u> The permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:
  - i. Identifies VHAP from the list presented in Table 5 of Subpart JJ (see attached) that are being used in finishing operations;
  - ii. Establishes a baseline level of usage for each VHAP identified. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified, except for formaldehyde and styrene which shall be determined as specified by '63.803 (l)(2). For VHAPs that do not have a baseline, one will be established according to the Work Practices Standards Condition 50.l.vi. below.

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- iii. Tracks the annual usage of each VHAP identified that is present in amounts subject to MSDS reporting as required by OSHA.
- iv. If the annual usage of the VHAP identified exceeds its baseline level, then the permittee of the facility shall provide a written notification to the South Central Regional Office that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:
  - (1) The exceedance is no more than 15.0 percent above the baseline level;
  - (2) Usage of the VHAP is below the de minimis level presented in Table 5 for that VHAP;
  - (3) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP: or
  - (4) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 lb VOC/lb solids, as applied.
- v. If none of the explanations listed in the Work Practices Standards Condition 50.l.iv., above, is the reason for the increase, the permittee shall confer with the South Central Regional Office to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the South Central Regional Office and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.
- vi. If the facility uses a VHAP of potential concern listed in Table 6 of Subpart JJ for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level provided in that same table. The permittee shall track the annual usage of each VHAP of potential concern identified that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the de minimis level listed in Table 6 of Subpart JJ for that chemical, then the permittee shall provide an explanation to the South Central Regional Office that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in the Work Practices Standards Condition 50.1.v., above, the affected source shall follow the procedures established in the Work Practices Standards Condition 50.1.v., above.

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### Recordkeeping

- 51. The permittee shall maintain records of the following:
  - a. For emission limit purposes the permittee shall maintain the following:
    - i. A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in Subpart JJ,
    - ii. The VHAP content, in lb VHAP/lb solids, as applied, of each finishing material and contact adhesive subject to the emission limits in Subpart JJ; and
    - iii. The VOC content, in lb VOC/lb solids, as applied, of each strippable booth coating subject to the emission limits in Subpart JJ.
  - b. Following the averaging method the permittee shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.
  - c. Following the continuous coating operations, where viscosity is being used to determine compliance, the permittee shall maintain the records required by Condition a above as well as the following:
    - i. Solvent and coating additions to the continuous coater reservoir;
    - ii. Viscosity measurements; and
    - iii. Data demonstrating that viscosity is an appropriate parameter for demonstrating compliance.
  - d. The permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
    - i. Records demonstrating that the operator training program required by the Work Practice Standards Condition **50.b.**, above, is in place;
    - ii. Records collected in accordance with the inspection and maintenance plan required by the Work Practice Standards Condition **50.c.**, above;
    - iii. Records associated with the cleaning solvent accounting system required by the Work Practice Standards Condition **50.d.**, above;
    - iv. Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period required by the Work Practice Standards Condition 50.h., above;

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- v. Records associated with the formulation assessment plan required by the Work Practice Standards Condition **50.1**., above; and
- vi. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- e. The permittee shall maintain records of the compliance certifications submitted for each semiannual period following the compliance date.
- f. The permittee shall maintain records of all other information submitted with the compliance status report and the semiannual reports.
- g. The permittee shall maintain files of all information (including all reports and notifications) required, recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

(9 VAC 5-60-100, 40 CFR 63.806 & 63.10(b)(1))

# **Notification of Compliance**

- 52. Each time a notification of compliance status is required, the permittee shall submit to the South Central Regional Office and the EPA a notification of compliance status, signed by a responsible official of the company that owns or operates the facility who shall certify its accuracy, attesting to whether the source has complied with Subpart JJ. The notification shall list:
  - a. The methods that were used to determine compliance;
  - b. The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
  - c. The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;
  - d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times and in accordance with the test methods specified;
  - e. An analysis demonstrating whether the facility is a major source or an area source (using the emissions data generated for this notification);

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- f. A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and
- g. A statement by the permittee as to whether the facility has complied with Subpart JJ as expressed in this permit.

(9 VAC 5-60-100, 40 CFR 63.9(h))

# Reporting

- 53. Reporting with regard to Subpart JJ not otherwise required by this permit shall consist of the following:
  - a. The permittee when demonstrating continuous compliance shall submit a report covering the previous 6 months of wood furniture manufacturing operations:
    - i. The time periods to be addressed are the calendar months <u>January through June</u> and <u>July</u> <u>through December</u>. Reports should be submitted to DEQ no later than <u>March 1</u> and <u>September 1</u> of each calendar year.
    - ii. The semiannual reports shall include the information required by the Continuous Compliance Condition 46, above, a statement of whether the facility was in compliance or noncompliance, and, if the facility was in noncompliance, the measures taken to bring the facility into compliance.
    - iii. The frequency of the reports required by the Reporting Condition 53.a., above, shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.
  - b. The permittee, when required to provide a written notification by the Work Practice Standards Condition **50.l.iv**., above, for exceedance of a baseline level [§63.803(l)(4)], shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than **March 1** after the end of the annual period in which the usage increase occurred.

(9 VAC 5-60-100, 40 CFR 63.807 & 63.10(d))

#### **Other Conditions**

#### **Visible Emission Standard**

54. Unless otherwise specified in this permit, visible emissions from the any emission unit at this facility shall not exceed 20 percent opacity, except during one six-minute period in any one hour in which visible

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emissions shall not exceed 60 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

(9 VAC 5-40-80, 9 VAC 5-80-110 A)

# **Fugitive Dust/Emission Standard**

55. During the operation of a stationary source or any other building, structure, facility or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.

(9 VAC 5-40-90, 9 VAC 5-80-110 A)

#### **Emission Tests**

- 56. Upon request of the Department, the permittee shall conduct emission tests in accordance with procedures approved by the Department and provide, or cause to be provided, emission testing facilities as follows:
  - Sampling ports adequate for test methods applicable to such source.
  - Safe sampling platforms.
  - Safe access to sampling platforms.
  - Utilities for sampling and testing equipment.

(9 VAC 5-40-30 F, 9 VAC 5-50-30 F)

#### **General Conditions**

#### Circumvention

57. No owner or other person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air pollutants emitted, conceals or dilutes an emission of air pollutants which would otherwise violate State Regulations. Such concealment includes, but is not limited to, 1) the use of gaseous diluents to achieve compliance with a visible emissions standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere, or 2) the piecemeal carrying-out of an operation to avoid coverage by a standard that applies only to operations larger than a specified size. This section does not prohibit the construction of a stack. (9 VAC 5-20-70)

#### **Good Air Pollution Control Practice**

58. To the extent practicable, the permittee shall at all times, including periods of startup, shutdown, and malfunction, maintain and operate the source including associated air pollution control equipment, if any, in a manner consistent with good air pollution control practice for minimizing emissions.

Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

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Excess emissions shall be reported and records maintained in accordance with the provisions of 9 VAC 5-20-180.

(9 VAC 5-20-180, 9 VAC 5-40-20, 9 VAC 5-50-20).

# **Duty to Supplement or Correct Application**

59. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. An applicant shall provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.

(9 VAC 5-80-80 E, 9 VAC 5-80-110 M)

# **Submissions Certification**

60. Any application form, report, compliance certification, or other document required to be submitted to the DEQ shall be signed by a responsible official.
 (9 VAC 5-80-80 G, 9 VAC 5-80-110 K)

# **Permit Duration and Application Shield**

- 61. This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless a timely and complete renewal application consistent, with 9 VAC 5-80-80, has been submitted, to the Department, by the owner, the right of the facility to operate shall be terminated upon permit expiration.
  - a. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
  - b. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
  - c. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
  - d. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.

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e. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C, and F; 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

# **Monitoring - Recordkeeping**

- 62. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
  - a. The date, place as defined in the permit, and time of sampling or measurements.
  - b. The date(s) analyses were performed.
  - c. The company or entity that performed the analyses.
  - d. The analytical techniques or methods used.
  - e. The results of such analyses.
  - f. The operating conditions existing at the time of sampling or measurement.

Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9 VAC 5-80-110 F)

# **Monitoring - Reporting**

- 63. The permittee shall submit the results of monitoring, including periodic monitoring, contained in any applicable requirement to DEQ every six months. The time periods to be addressed are the calendar months **January through June** and **July through December**. Reports should be submitted to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:
  - a. The time period included in the report.
  - b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:
    - i. exceedance of emissions limitations or operational restrictions;

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- ii. excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or
- iii. failure to meet monitoring, record-keeping, or reporting requirements contained in this permit.
- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual period."
- d. Report recipients: The semi-annual reports required by this Title V operating permit shall be sent to:

VA DEQ South Central Regional Office Attn: Air Compliance Manager 7705 Timberlake Road Lynchburg, VA 24502

(9 VAC 5-80-110 F)

#### **Permit Deviation Reporting**

64. The permittee shall report by the next business day any deviations from permit requirements or any excess emissions, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken.

(9 VAC 5-80-110 F.2)

#### **Failure/Malfunction Reporting**

65. In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours, notify the South Central Regional Office by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within two weeks provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the South Central Regional Office.

(9 VAC 5-20-180 C, 9 VAC 5-40-50, 9 VAC 5-50-50)

#### **Severability**

66. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.

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(9 VAC 5-80-110 G)

# **Duty to Comply**

67. The permittee shall comply with all conditions of the permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(9 VAC 5-80-110 G, 9 VAC 5-80-260 A)

#### **Need to Halt or Reduce Activity Not a Defense**

68. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (9 VAC 5-80-110 G)

#### **Permit Action for Cause**

- 69. The permit may be modified, revoked, reopened, and reissued, or terminated for cause as specified in 9 VAC 5-80-110 L, 9 VAC 5-80-240 and 9 VAC 5-80-260. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
  - a. This permit will be reopened and revised by the DEQ prior to expiration due to the following causes:
    - i. If additional applicable federal requirements become applicable to a major source with a remaining permit term of three or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire.
    - ii. If the Board or the EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
    - iii. If the EPA or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
    - iv. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date of this permit.
  - b. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

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- c. Reopenings shall not be initiated before a notice of such intent is provided to the source by the Board at least 30 days in advance of the date that the permit is to be reopened, except that the Board may provide a shorter time period in the case of an emergency.
- d. If the EPA finds that cause exists to terminate, modify, or revoke and reissue a permit pursuant to 9 VAC 5-80-240 A, the EPA shall notify the Board and the permittee of such finding in writing. Following such notification the procedures as listed in 9 VAC 5-80-240 D shall be followed.
- e. A permit may be revoked or terminated prior to its expiration date if the owner does any of the following:
  - i. Knowingly make material misstatements in the permit application or any amendments thereto.
  - ii. Violates, fails, neglects or refuses to comply with (i) the terms or conditions of the permit, (ii) any applicable requirements, or (iii) the applicable provisions of 9 VAC 5 Chapter 80 Article 1.

The Board may suspend, under such conditions and for such period of time as the Board may prescribe, any permit for any of the grounds for revocation or termination stated above for any other violations of the regulations.

(9 VAC 5-80-110 G, 9 VAC 5-80-110 L, 9 VAC 5-80-240, 9 VAC 5-80-260)

# **Property Rights**

70. The permit does not convey any property rights of any sort, or any exclusive privilege. (9 VAC 5-80-110 G)

#### **Duty to Submit Information**

71. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality. (9 VAC 5-80-110 G)

#### **Duty to Pay Permit Fees**

72. The permittee shall pay a permit fee consistent with the requirements of 9 VAC 5 Chapter 80 Article 2 of the State Regulations. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the department.

(9 VAC 5-80-110 H, 9 VAC 5-80-340 C)

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## **Emissions Trading**

73. No permit revision shall be required, under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit.

(9 VAC 5-80-110 I)

#### **Inspection and Entry Requirements**

- 74. Upon presentation of credentials and other documents as may be required by law, the owner shall allow the Board to perform the following:
  - a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
  - d. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K, 9 VAC 5-80-260 E, 9 VAC 5-170-130)

# **Annual Compliance Certification**

- 75. Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to DEQ and EPA no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitations standards or work practices. The time period to be covered by the certification is the calendar months **January through December**. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:
  - a. The time period included in the certification.
  - b. A description of the means for assessing or monitoring the compliance of the source with its emissions limitations, standards, and work practices.
  - c. The identification of each term or condition of the permit that is the basis of the certification;
  - d. The status of compliance with the terms and conditions of this permit for the certification period.;

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- e. Consistent with subsection 9 VAC 5-80-110 E, identification of the method or methods used for determining the compliance status of the source with each term and condition at the time of certification and over the certification period, and whether such methods or other means provide continuous or intermittent data.;
- f. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
- g. Such other facts as the permit may require to determine the compliance status of the source.

Copies of the annual compliance certification shall be sent to the EPA and the South Central Regional Office at the following addresses:

U.S. EPA, Region III Clean Air Act Title V Compliance Certification (3AP00) 1650 Arch Street Philadelphia, PA 19103-2029.

VA DEQ South Central Regional Office Attn: Air Compliance Manager 7705 Timberlake Road Lynchburg, VA 24502

(9 VAC 5-80-110 K)

#### **Federal Enforceability**

76. All terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the EPA and citizens under the federal Clean Air Act.
(9 VAC 5-80-110 N)

#### **Permit Shield**

- 77. The permit shield provides that:
  - a. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements in effect as of the date of permit issuance and as specifically identified in the permit. The permit shield shall cover only the applicable requirements that are covered by terms and conditions of the permit.
  - b. Nothing in 9 VAC 5-80-140 or in this permit shall alter or affect the following:
    - i. The provisions of ' 303 of the federal Clean Air Act (emergency orders), including the authority of the EPA under that section.

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- ii. The liability of an owner for any violation of applicable requirements prior to or at the time of permit issuance.
- iii. The ability to obtain information from a source by the (1) EPA pursuant to '114 of the federal Clean Air Act (inspections, monitoring, and entry); (2) Board pursuant to '10.1-1314 or '10.1-1315 of the Virginia Air Pollution Control Law; or (3) department pursuant to '10.1-1307.3 of the Virginia Air Pollution Control Law.

(9 VAC 5-80-140)

#### **Transfer of Permit**

78. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.

In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.

In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200. (9 VAC 5-80-160)

#### **Changes to Permit**

79. Changes to emissions units that pertain to applicable federal requirements at a source with a permit issued shall be made as specified under 9 VAC 5-80-190 B through D and 9 VAC 5-80-200 through 9 VAC 5-80-240. Changes to emissions units that pertain to applicable state requirements at a source with a permit issued shall be made as specified under 9 VAC 5-80-190 E. (9 VAC 5-80-190 A)

#### Malfunction as an affirmative defense

80. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the conditions of the following paragraph are met.

The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

- a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
- b. The permitted facility was at the time being properly operated.

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- c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
- d. The permittee notified the board of the malfunction within two working days following the time when the emissions limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F.2. b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirements under 9 VAC 5-20-180 C.

In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250, 9 VAC 5-20-180 C)

# **Stratospheric Ozone Protection**

81. If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F. (40 CFR Part 82, Subparts A-F)

#### **Accidental Release Prevention**

82. If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.

(40 CFR Part 68)

## **Permit on Site**

83. Within five days after receipt of the issued permit, the applicant shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to the Board upon request.

(9 VAC 5-80-150 E)

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**Summary - Permitted Equipment, Terms, and Conditions** 

| Emission<br>Unit<br>ID                    | Pollutant<br>Emitted           |   | nit / Work Practice<br>andard                    | Regulations                                      | Control Equipment or Method Conditions | Testing<br>Requirement<br>Conditions | Monitoring<br>Requirement<br>Conditions | Record- keeping<br>Requirement<br>Conditions | Reporting<br>Requirement<br>Conditions |
|---|--------------------------------|---|--|--|--|--------------------------------------|---|--|--|
| Fuel Burning                              |                                |   |  |  |  |                                      |   |  |  |
| B#5                                       | PM<br>PM-10                    | Emission Limit<br>Opacity               | Condition 5 Condition 6                          | 9 VAC 5-50-260<br>9 VAC 5-50-80                  | 3,                                     | 11                                   | 9, 10, 12                               | 13   |  |
| B#5                                       | $SO_2$                         | Limit                                   | Condition 4                                      | 9 VAC 5-80-10                                    | 7                                      |                                      | 8                                       | 13   |  |
| Woodworkii                                | ng Operatio                    | ons                                     |  |  |  |                                      |   |  |  |
| W1 [BHS(A),<br>BHS(B), BHS(D),<br>BHS(E)] | PM<br>PM-10                    | Emission Limit<br>Opacity               | Condition 21<br>Condition 22, 23                 | 9 VAC 5-50-260                                   | 14, 15                                 |                                      | 31, 34                                  | 35   |  |
| W1 [BH1 thru<br>BH10]                     | PM<br>PM-10                    | Emission Limit<br>Opacity               | Condition 24 Condition 25                        | 9 VAC 5-40-2270<br>9 VAC 5-40-80                 | 14, 15                                 |                                      | 33, 34                                  | 35   |  |
| W1 [0121 thru<br>4239]                    | PM<br>PM-10                    | Emission Limit<br>Opacity               | Condition 24<br>Condition 25                     | 9 VAC 5-40-2270<br>9 VAC 5-40-80                 | 16,17                                  |                                      | 33, 34                                  | 35   |  |
| W1 [0007]                                 | PM<br>PM-10                    | Throughput<br>Emission Limit<br>Opacity | Condition 27<br>Condition 28<br>Condition 29, 30 | 9 VAC 5-50-260                                   | 18, 19, 20                             |                                      | 32, 34                                  | 35   |  |
| Furniture Fi                              | inishing Op                    | erations                                |  |  |  |                                      |   |  |  |
| F1 Plant 4 & [4623]                       | VOC                            | Emission Limit                          | Condition 37                                     | 9 VAC 5-50-260                                   |  |                                      |   | 43   |  |
| F1 Plant 4 & [4623]                       | PM<br>PM-10                    | Opacity                                 | Condition 38                                     | 9 VAC 5-50-260                                   | 36                                     |                                      | 40, 42                                  | 43   |  |
| F1 [all other]                            | PM<br>PM-10                    | Opacity                                 | Condition 39                                     | 9 VAC 5-40-80                                    | 36,                                    |                                      | 41, 42                                  | 43   |  |
| Wood Dryin                                | <u> </u>                       | ns                                      |  |  |  |                                      |   |  |  |
| DK  | VOC                            | Opacity                                 | Condition 54                                     | 9 VAC 5-40-80                                    |  |                                      |   |  |  |
| Insignificant                             |                                | t or Activities                         |  | _  |  | 1                                    | 1                                       |  |  |
| DFP                                       | PM<br>PM-10<br>SO <sub>2</sub> |   | Condition 2                                      | 9 VAC 5-40-20<br>9 VAC 5-40-80<br>9 VAC 5-40-280 |  |                                      |   |  |  |
| PW  | VOC                            |   | Condition 2                                      | 9 VAC 5-40-20                                    |  |                                      |   |  |  |
| Gl  | PM<br>PM-10                    |   | Condition 2                                      | 9 VAC 5-40-20<br>9 VAC 5-40-80                   |  |                                      |   |  |  |
| CDT                                       | VOC                            |   | Condition 2                                      | 9 VAC 5-40-20                                    |  |                                      |   |  |  |

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| Emission<br>Unit<br>ID | Pollutant<br>Emitted     | Emissions Limit / Work Practice<br>Standard | Regulations                                      | Control<br>Equipment or<br>Method<br>Conditions | Testing<br>Requirement<br>Conditions | Monitoring<br>Requirement<br>Conditions | Record- keeping<br>Requirement<br>Conditions | Reporting<br>Requirement<br>Conditions |
|------------------------|--------------------------|---|--|---|--------------------------------------|---|--|--|
| WOB                    | PM-10<br>SO <sub>2</sub> |   | 9 VAC 5-40-20<br>9 VAC 5-40-80<br>9 VAC 5-40-280 |   |                                      |   |  |  |

# **SOURCE TESTING REPORT FORMAT**

#### Cover

- 1. Plant name and location
- 2. Units tested at source (indicate Ref. No. used by source in permit or registration)
- 3. Tester; name, address and report date

#### Certification

- 1. Signed by team leader / certified observer (include certification date)
- \* 2. Signed by reviewer

#### Introduction

- 1. Test purpose
- 2. Test location, type of process
- 3. Test dates
- \* 4. Pollutants tested
- 5. Test methods used
- 6. Observers' names (industry and agency)
- 7. Any other important background information

#### Summary of Results

- 1. Pollutant emission results / visible emissions summary
- 2. Input during test vs. rated capacity
- 3. Allowable emissions
- \* 4. Description of collected samples, to include audits when applicable
- 5. Discussion of errors, both real and apparent

#### Source Operation

- 1. Description of process and control devices
- 2. Process and control equipment flow diagram
- 3. Process and control equipment data

# \* Sampling and Analysis Procedures

- 1. Sampling port location and dimensioned cross section
- 2. Sampling point description
- 3. Sampling train description
- 4. Brief description of sampling procedures with discussion of deviations from standard methods
- 5. Brief description of analytical procedures with discussion of deviation from standard methods

#### Appendix

- \* 1. Process data and emission results example calculations
- 2. Raw field data
- \* 3. Laboratory reports
- 4. Raw production data
- \* 5. Calibration procedures and results
- 6. Project participants and titles
- 7. Related correspondence
- 8. Standard procedures

<sup>\*</sup> Not applicable to visible emission evaluations.